# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER LAIRD,

Plaintiff,

Case 1:08-cv-00888-NRB

Case No. 1:08-cv-0888

vs.

MCALLISTER TOWING,

Defendant.

ROBERTA E. ASHKIN (#115461515) Local Counsel 580 Broadway, Ste. 1101 New York, NY 10012 212-965-0010 212-965-1301 - fax robertaashkin@aol.com

### MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Roberta E. Ashkin, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of:

Kirk E. Karamanian O'Bryan Baun Cohen Kuebler Karamanian 401 S. Old Woodward, Ste. 450 Birmingham, MI 48009 (248) 258-6262 (248) 258-6047 - fax kkaramanian@obryanlaw.net

Kirk E. Karamanian is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against Kirk Karamanian.

### THE SUPREME COURT of the STATE OF MICHIGAN

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

### Kirk Edward Karamanian

was admitted to the practice of law in the courts of the State of Michigan on

June 9, 1995

and has remained in good standing since then.

In Testimony Whereof, I set my hand and affix the seal of the Michigan Supreme Court on this date: April 28, 2008

De party Clerk

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CHRISTOPHER LAIRD,

Plaintiff,

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VS.

MCALLISTER TOWING,

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#### AFFIDAVIT OF ROBERTA E. ASHKIN IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

STATE OF NEW YORK

COUNTY OF Landon

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

l. I am counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Kirk E. Karamanian as counsel pro hac vice to represent Plaintiff in this matter.

- 2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
  - 3. I have known Kirk E. Karamanian since 2007.
- 4. Kirk E. Karamanian is associated with the firm of O'Bryan Baun Cohen Kuebler Karamanian in Birmingham, Michigan.
- 5. I have found Kirk E. Karamanian to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
- 6. Accordingly, I am pleased to move the admission of Kirk E. Karamanian, pro hac vice.
- 7. I respectfully submit a proposed Order granting the admission of Kirk E. Karamanian, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Kirk E. Karamanian, *bro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

Roberta E. Ashkin

SDNY Bar Code: 115461515

Subscribed and sworn to before me

this 30 day of March, 2008.

Commission Expires Iv.ay 31, 20\_

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## ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Roberta E. Ashkin, attorney for Plaintiff and said sponsor attorney's affidavit in support;

#### IT IS HEREBY ORDERED that

Kirk E. Karamanian O'Bryan Baun Cohen Kuebler Karamanian 401 S. Old Woodward, Ste. 450 Birmingham, MI 48009 (248) 258-6262 (248) 258-6057 fax kkaramanian@obryanlaw.net

is admitted to practice <u>pro hac vice</u> as counsel for Plaintiff in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

	United States District Judge
Dated:	
<u>vice</u> fee to the Clerk of the Court.	
immediately apply for an ECF password at nys	d.uscourts.gov. Counsel shall forward the <u>pro</u> <u>hac</u>
attorneys. If this action is assigned to the El	ectronic Case Filing (ECF) system, counsel shall